

**REMARKS**

The Office action dated November 5, 2003 and the cited reference have been carefully considered.

**Status of the Claims**

Claims 1-29, 46-49, and 51 are pending in the current prosecution. Claims 4-29 are allowed. The Applicants wish to thank the Examiner for indicating that claims 4-29 are allowed.

Claims 1-3, 46-51 are rejected under 35 U.S.C. § 102(e) as being anticipated by Ovshinsky et al. (U.S. Patent 3,763,468; hereinafter "Ovshinsky"). The Applicants respectfully point out that the Examiner erroneously used Section 102(e) as the basis for the claim rejection because Ovshinsky's application was not pending when the instant application was filed. The Applicant believe that the Examiner meant to reject claims 1-3, 46-49, and 51 under 35 U.S.C. § 102(b). In addition, claim 50 was already canceled in a previous amendment. Therefore, the rejection of claim 50 is moot. The Applicants will respond to the rejection of claims 1-3, 46-49, and 51 under Section 102(b). The Applicants respectfully traverse this rejection for the reasons set forth below.

**Claim Rejection Under 35 U.S.C. § 102(b)**

Claims 1-3, 46-49, and 51 are rejected under 35 U.S.C. § 102(b) as being anticipated by Ovshinsky. The Applicants respectfully traverse this rejection because Ovshinsky does not disclose expressly or inherently each and every element of claims 1-3, 46-49, and 51.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a *single* prior art reference."

*Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q2d 1051, 1053 (Fed. Cir. 1987) (emphasis added). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

First, Ovshinsky discloses an electroluminescent phosphor material (column 11, lines 58-59). Phosphor materials are inorganic light emitting materials, not organic light emitting materials.

In contradistinction, claims 1-3, 46-49, and 51 recite organic light emitting diodes; i.e., the light emitting material is organic. Therefore, Ovshinsky does not disclose the light emitting material of claims 1-3, 46-49, and 51.

Second, Ovshinsky discloses only light emitting elements that are electrically connected in parallel. When similar light emitting elements are electrically connected in parallel, the first terminals of all the elements are connected to the same electrical line and receive the same electrical potential. Let's look at Figure 1 of Ovshinsky with the help of, for example, Figure 2 for details. For example, electrical line 20 applies the same electrical potential to first terminal 15 of each of light emitting elements 14 (in combination with memory 13). The second terminal 15' of the first light emitting element 14 is connected to electrical line 26, while the second terminal 15' of the second light emitting element 14 is connected to electrical line 27. Other light emitting elements are connected in a similar manner. Therefore, Ovshinsky's light emitting elements are electrically independent from each other. This must be the case for Ovshinsky because each light element must operate independently as an independent pixel. This is a classic, elementary case of electrical components connected in parallel.

In contradistinction, claims 1-3, 56-49, and 51 recite light emitting elements that are electrically connected in series. When light emitting elements are electrically connected in series, as is recited in the instant claims, the second terminal of a prior element in the series is connected to the first terminal of the

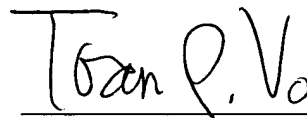
immediately following element. Therefore, the electrical potential at the first terminal of the prior element is not the same as the electrical potential at the first terminal of the immediately following element, which potential is essentially equal to the potential at the second terminal of the prior element. It is very clear that Ovshinsky does not disclose this limitation of the instant claims because all of Ovshinsky's first terminals 15 of, say, light emitting elements 14 of the first row receive the same electrical potential in electrical line 20.

Since Ovshinsky does not disclose each and every element of claims 1-3, 46-49, and 51, Ovshinsky does not anticipate these claims.

If the Examiner wishes to discuss Ovshinsky's teaching further in order to advance this application to allowance, the Examiner is invited to call the Applicants' attorney whose telephone number is indicated below.

In view of the above, it is submitted that the claims are patentable and in condition for allowance. Reconsideration of the rejection is requested. Allowance of claims at an early date is solicited.

Respectfully submitted,



Toan P. Vo, Ph.D.  
Attorney for the Applicants  
Registration No. 43,225  
(518)387-6648

Schenectady, New York  
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